

PUBLIC COMMENTS RECEIVED FROM MARK FRANCIS, REDTAIL AVIATION

AT MARCH 9-10 NPOAG MEETING

Mar 9, 2011

Voluntary Agreement. NPOAG has spent 11 years chasing a ghost called the ATMP. It has yet to materialize. This fails all tests of reasonableness I can imagine. I was called upon to attempt a Voluntary Agreement with the Park Service at Canyonlands. I am willing to tackle that if Kate Cannon knows she has the authority to do that and we can try to get it done without interference, guidance or outlines from this committee or the park service unless we ask for it. We will do this with a future ATMP in mind. I think we can get this done and submit it to my FSDO in Salt Lake City for approval, or at least acceptance, on safety grounds. If that succeeds it could be an outline for completing an ATMP.

Matt Zuccaro indicated that in business, with 11 years, \$25 million spent and no results all would be fired. I added that it would have happened in 6 months with \$25,000 spent.

Although I have great respect and admiration for the two board members from Grand Canyon Air, they are both from the same company and occupying the two seats from the air tour industry. This is a situation that devalues the opinions of the board and opens up any findings to a lot of scrutiny.

Mar 10, 2011

I continue to be amazed that I am listening to a board that has been operating for 11 years. There is nothing here. No decisions, no production. I feel like I am listening to the first meeting there has ever been on this issue.

Competitive bids for the OA? Small communities cannot support large aircraft or QT. It is quite possible, if QT is a large part of the selection process, that someone new could route out a proven operator with expensive aircraft and then not be able to support them, failing and leaving a hole.

This system, although completely failed, has limited the growth and opportunities for the existing air tour operators and the entrance of new operators. If that is the goal then consider this a success and write it off.

Economic factors. I can't imagine that this board or any government agency could make a financial decision about my company or how many companies could operate in a certain market. DOT economic authority is specific under part 135 and 121 and about all you should require.

Priorities. That you are chasing Death Valley or some other minor park is pure cowardice. You are going to get sued no matter what you do. Do it where it matters and where the operators/wounded parties can afford the chase this thing to legit conclusion in court.

FAA budgetary constraints.

Quiet Technology. Is there any quantitative analysis of what “quiet technology” is for fixed wing aircraft? Is there, in a scenic flight profile (appropriate altitude, etc), an analysis that says that says a Caravan or Twin Otter is Xdb quieter, on the ground, and creates X percentage less park impact. Alan Stephen’s point about incentives is very important to me. Is acquiring QT a real incentive that allows us to recoup that investment or is it a dis-incentive to not have it.